

~~EXEMPT FROM REVIEW~~

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUL 27 1992

Federal Communications Commission
Office of the Secretary

In re Applications of)	MM Docket No. 92-114
)	
Robert B. Taylor)	
Jupiter, Florida)	FCC File No. BRH-880926UJ
)	
For Renewal of Station WTRU(FM))	
)	
Jupiter Broadcasting, Corp.)	FCC File No. BPH-890103MD
Jupiter, Florida)	
)	
For a Construction Permit)	

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To: Honorable Walter C. Miller
Administrative Law Judge

JUL 27 1992

FCC MAIL BRANCH

SECOND PETITION TO ENLARGE ISSUES
AGAINST ROBERT B. TAYLOR

1. Jupiter Broadcasting, Inc. ("JBC") asks that the issues in this proceeding be enlarged to inquire into certain misrepresentations made by Robert B. Taylor in response to JBC pleadings and discovery requests. Specifically Mr. Taylor has misrepresented his motivation for participating in a rulemaking proceeding to change the FM table of allotments at Melbourne, Florida and his motivation for filing a White City, Florida counterproposal in a Jupiter, Florida rulemaking.

MELBOURNE RULEMAKING

2. In the First Petition To Enlarge Issues Against Robert B. Taylor ("First Petition"), JBC argued that Mr. Taylor was a

No. of Copies 046

proponent of the Jupiter, Florida channel change proposed in the Melbourne, Florida Rule Making in MM Docket No. 87-233.¹ JBC noted that this was an attempt by Mr. Taylor to obtain a frequency that could be upgraded to a higher class FM allotment. See First Petition at page 20. JBC advanced the same argument at pages 17-18 of its May 22, 1992 Motion For Partial Summary Decision.

3. Robert B. Taylor's Objection to Motion For Partial Summary Decision ("Objection") squarely denied JBC's allegation that Mr. Taylor was seeking an upgradeable frequency in the Melbourne Rule Making, stating:

In paragraph 29 on page 18 of its motion, JBC states: "This second WTRU (FM) channel change was an unsuccessful attempt to obtain a frequency that could be upgraded to a higher class FM allotment." This allegation by JBC is simply not true. The fact is that I was faced with a choice of either fighting at the FCC to keep 107.1 or reluctantly agreeing to accept 99.5. I chose the latter. If I had decided to fight for 107.1, WTRU (FM) would have been forced to be silent even longer than it was. Further, there was no opportunity to upgrade on 99.5. I know this is a fact because I requested an upgrade on 99.5 and was told this was precluded due to a new FM station at Vero Beach on 99.7. However, if I had been able to hold onto 107.1 as I originally intended, WTRU (FM) would be broadcasting today with at least 6000 watts ERP and possibly 25,000 watts.

See Objection at page 5.

4. In its First Request for Admissions, JBC propounded the following Admission Request No. 57 to Mr. Taylor:

The reason Robert B. Taylor consented to the proposal of Silicon East Communications Corporation to upgrade the Channel of Station WAOA, was that he was seeking a channel on which Station WTRU(FM) could be upgraded to a higher class facility.

¹Mr. Taylor's company, US Three Broadcasting Corp., was the actual party to the Melbourne Rule Making proceeding. See Notice Of Proposed Rule Making, 2 FCC Rcd. 3940 (1987).

Mr. Taylor denied this admission request in Taylor Response to JBC First Request For Admissions at page 4.

5. Documents produced from Mr. Taylor's former counsel, James R. Bayes, Esq., demonstrate that Mr. Taylor's strategy throughout the Melbourne Rule Making was to obtain a channel on which Station WTRU (FM) could be upgraded. Silicon East Communications filed its Petition For Rule Making initiating the Melbourne Rule Making on February 27, 1987,² proposing a change in the Jupiter FM allotment from Channel 296A to Channel 258A.

6. On April 2, 1987 Robert B. Taylor wrote to his counsel referring to a "telephone conversation we had a couple of weeks ago" in which they had discussed asking the Commission to allot Channel 258C2 to Jupiter. The apparent purpose of Mr. Taylor's letter was to arrive at strategy to upgrade the Jupiter allotment in the context of the Melbourne Rule Making. See Exhibit No. 2, hereto.

7. Mr. Taylor and his counsel settled on a two-step approach to upgrading the Jupiter FM allotment. Mr. Taylor supported the allotment of Channel 258A to Jupiter. See Notice of Proposed Rule Making, 2 FCC Rcd 3940 (1987). Then, Mr. Taylor gave his counsel instructions to wait for the FCC order allotting the channel and "immediately file a Petition for rule making on behalf of U.S. Three Broadcasting Corp. asking the FCC to upgrade the Jupiter assignment from channel 258A to 258C2". See Exhibit No. 3, hereto.

²See Letter from James R. Bayes to William J. Tricarico dated April 30, 1987, appended as Exhibit No. 1 hereto.

8. Mr. Taylor's communications with counsel demonstrate that his intent in supporting the Melbourne Rule Making was to obtain a channel to upgrade his Jupiter, Florida FM station. Mr. Taylor has brazenly misrepresented this intent in his filings in this proceeding. An appropriate misrepresentation issue should be specified.

WHITE CITY, FLORIDA RULEMAKING

9. In the First Petition To Enlarge Issues Against Robert B. Taylor, JBC sought a rulemaking abuse issue based upon Mr. Taylor's filings in the Jupiter, Florida Rule Making in MM Docket No. 88-366. Specifically, JBC argued that Mr. Taylor abused Commission processes by filing a White City, Florida counterproposal for the purpose of avoiding competition from a new Jupiter FM allotment. See First Petition at page 29.

10. In opposing JBC's request to add issues, Mr. Taylor avoided JBC's allegation that the White City counterproposal was motivated by a desire to avoid competition. He stated:

JBC starts here with another of its conclusions which it states as being fact: "to avoid competition...Taylor had U.S. Three Broadcasting Corp. file a counterproposal" (paragraph 56, page 29). JBC doesn't say "we suspect that's why he did it," instead JBC just says "he did it".³

However Mr. Taylor flatly denied the following Admission Request No. 154, inquiring into his intent in filing the White City, Florida, counter proposal:

³Opposition To First Petition To Enlarge Issues Against Robert B. Taylor at page 8.

Exhibit No. 22 was filed in an attempt to prevent the creation of a new FM allotment for Jupiter, Florida⁴

11. Documents supplied by Mr. Taylor's former counsel demonstrate that Mr. Taylor misrepresented his motives for filing the White City, Florida counterproposal. Specifically, on August 22, 1988, Mr. Taylor wrote James R. Bayes, Esquire, stating, inter alia:

Regarding the petition to the FCC proposing allotting channel 288A (105.5 MHz) to Jupiter, Florida as its second FM service, I feel I must do all I can to stop this allotment. (I am not at all interested in having a new FM competitor in my city of license). (This is MM docket 88-366 by NPRM (DA88-1136) adopted June 29, 1988. Comments are due by September 23, 1988; replies October 11, 1988. You might want to check these dates for accuracy.)

I would like you to prepare and file comments with the FCC before the comment due date (9-23-88) on behalf of U.S. Three Broadcasting Corporation, licensee of WKSJ(FM), Jupiter. Jim, I am open to suggestions from you as to what we should say in these comments, but one thing that comes to my mind would be to ask the FCC to give FIRST service to a community without an FM instead of giving SECOND service to Jupiter which already has an FM as first service (and an AM station).


See Exhibit No. 4, hereto.

12. JBC submits that Mr. Taylor's own letter demonstrates the falsity of his response to JBC's Admission Request No. 154. Mr. Taylor's motive to dissemble in this regard is manifest. The Presiding Judge has ruled that scrutiny of Mr. Taylor's broadcast stewardship under the renewal expectancy issue embraces his entire

⁴See First Request For Admissions, and Taylor Response To First Request For Admissions. Exhibit No. 22 to the First Request For Admissions was the "Comment and Counterproposal of U.S. Three Broadcasting Corporation" proposing to allot Channel 288A to White City, Florida, in lieu of Jupiter, Florida.

past operation, including "any failure to maintain a public file...keeping his broadcast operations off-the-air, making false representations in his renewal applications, abusing the Commission's processes, ineptness, etc." [Emphasis supplied]. See Memorandum Opinion and Order, FCC 92M-677, released June 15, 1992. An appropriate misrepresentation issue should be specified inquiring into Mr. Taylor's false response to Admission Request No. 154.

Respectfully submitted,



Joseph M. Belisle
Counsel for
Jupiter Broadcasting, Corp.

July 24, 1992

Leibowitz & Spencer
One S.E. Third Avenue
Suite 1450
Miami, Florida 33131

(305) 530-1322

EXHIBIT NO. 1

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JUL 27 1962

FCC MAIL BRANCH

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EXHIBIT NO. 1

WILEY, REIN & FIELDING

1776 K STREET, N.W.

WASHINGTON, D. C. 20006

APR 30 1987

FCC
Office of the Secretary

JAMES R. BAYES
(202) 429-7064

April 30, 1987

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Mr. William J. Tricarico
Secretary
Federal Communications Commission
Washington, D.C. 20554

MAY 1987 FCC MAIL BRANCH

FM BRANCH

Re: WKSJ(FM) and WTRU(AM), Jupiter, Florida

Dear Mr. Tricarico:

By letter dated April 1, 1987, U.S. Three Broadcasting Corporation and U.S. Two Broadcasting Corporation, licensees of WKSJ(FM) and WTRU(AM), Jupiter, Florida, advised the Commission that the stations had temporarily suspended operations effective April 1, 1987.

As the Commission's records will reflect, WKSJ(FM) has heretofore operated on Channel 244A (96.7 MHz). In its Second Report and Order in Docket No. 2139, 47 RR 2d 1280 (1980), the Commission changed the Jupiter FM channel assignment from 244A to 296A in order to accommodate a new allotment at Homestead, Florida. The Commission, however, permitted WKSJ to continue to operate on Channel 244 until a permittee for the new Homestead station had been selected. In March of 1986, the Commission issued a construction permit for the Homestead FM station to Radio Intermart Corporation. After extended negotiations between U.S. Three and Radio Intermart concerning reimbursement for the expense U.S. Three will incur in connection with the frequency change necessary to accommodate the new FM station, U.S. Three agreed to vacate Channel 244A. To that end, WKSJ(FM) temporarily suspended operations on April 1, 1987. Because WTRU(AM) simulcasts the WKSJ programming, the AM station also suspended operations on that date. U.S. Three understands that WKSJ may not resume operations on Channel 244 and, consistent with the Commission's 1980 rulemaking decision, the station would be required to resume operations on Channel 296A.

However, on or about February 27, 1987, Silicon East Communications Corporation ("SEC"), licensee of WVTI(FM), Melbourne, Florida submitted a petition for rulemaking to

WILEY, REIN & FIELDING

Mr. William J. Tricarico

April 30, 1987


Page 2

permit WVTI to upgrade from Class A to Class C2 facilities. In order to accommodate the WVTI upgrade, SEC proposes that the Commission substitute Channel 258A for the current, but as yet unused, allotment of Channel 296A at Jupiter, Florida. U.S. Three has no objection to the proposed channel substitution, and has this day filed a statement in support of SEC's petition for rulemaking. However, U.S. Three is deeply concerned by the prospect of making two substantial frequency changes, possibly within the space of a few months, in order to accommodate changes in the Table of Allotments proposed by other parties. The licensee's present financial condition does not permit it to absorb the potentially devastating impact of repeated disruptions of its operations and the need to establish, and then reestablish, an identity on a new channel. In addition, U.S. Three respectfully submits, the public interest would not be served by two such rapid changes in the frequency on which WKSJ is required to operate.

Accordingly, it is hereby respectfully requested that WKSJ and its sister AM station, WTRU, be permitted to remain silent pending the Commission's disposition of the SEC petition for rulemaking. U.S. Three and U.S. Two Broadcasting Corporation will undertake to reinstitute service on WKSJ and WTRU expeditiously once it is determined on which frequency the FM station will operate permanently.

Should any question arise concerning this matter, kindly advise the undersigned.

Respectfully submitted,



James R. Bayes
Counsel for WKSJ and WTRU

cc (BY HAND)
Gordon Malick

EXHIBIT NO. 2

RECEIVED

~~DEC 27~~ 1962

FCC MAIL BRANCH

4045-1-1

WKSJ KOSY 97FM

THE PALM BEACHES EASY LISTENING STATION

James R. Bayes, Esq.
Wiley, Rein & Fielding
1776 K Street NW, 10th Floor
Washington, D.C. 20006

Dear Jim:

Thanks for your help in successfully completing the transaction with Radio Intermart. That was the short term goal I was trying to achieve, and now the money is safely in the bank, ready to be used for the frequency change. As I mentioned to you on the phone today, I have already told Jim Martin, the principal in Radio Intermart, in a phone conversation with him that WKSJ has gone dark...vacated 96.7 for good...so he can proceed to go on the air.

Enclosed is a copy of the letter I mailed (in triplicate) to the FCC on April 1. As you know, this notification was required within the first ten days of our ceasing operation.

It is now time to plan strategy regarding: a) Getting FCC approval for remaining dark beyond April 30; b) Responding to the February 27 Petition for Rule Making filed by Silicon East Communications Corp. of Melbourne, Florida; and c) Taking positive, aggressive action at the FCC asking them to immediately change the Table of Assignments at Jupiter (changing the assignment from channel 296A Class A 107.1 to channel 258C2, Class C2 99.5) so WKSJ-FM will know what frequency to change to and can therefore take steps to get back on-the-air as soon as possible.

Regarding your suggestion on the phone today to ask for a change only to 258A instead of 258C2, I don't agree. This would be dangerous because in the interim some other station could come in and apply for an upgrade or other change that would have the effect of precluding the use of 258C2 at Jupiter, and then we would lose it by virtue of not aggressively asking for it now while we know it's available (see enclosed computer study of distances by kilometer showing that channel 258C2 fits perfectly at the existing Jupiter transmitter site). In fact, in a telephone conversation we had a couple of weeks ago, that strategy was your suggestion.

In any case, I think we should agree and then act on these matters as soon as possible so WKSJ (FM) can get back on the air and start serving its community of license again. Please decide what action you think we should take at what timetable and let me know.

As you know, the Jupiter phone has been disconnected and I can be reached at my home number (305) 636-3194 or through WXKE in Ft. Wayne, IN at (219) 484-0580. Mail can be sent to: Robert B. Taylor, 661 Bird Island Drive, Cocoa, FL 32926, or Robert B. Taylor, c/o WXKE, 2541 Goshen Road, Ft. Wayne, IN 46808.

Sincerely,

Robert B. Taylor

RBT/ms
Enc.

Serving Palm Beach & Martin Counties • 500 N. Delaware Blvd. • Jupiter, FL 33458 • 305/746-5191

EXHIBIT NO. 3

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JUL 2 3
FCC MAIL ROOM

4045-1-1

WKSJ KOSY 97FM

THE PALM BEACHES EASY LISTENING STATION

James R. Bayes
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RECEIVED
JAN 27 1988
FCC MAIL BRANCH

Dear Jim:

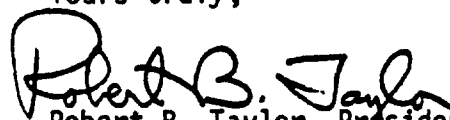
I believe we will need to again renew the FCC authority for the Jupiter stations to remain silent for at least another 90 days. The WKSJ-FM authority expires as of 2-2-88. The WTRU-AM authority expires as of 3-1-88.

On January 21 I spoke with Gary Hess of SEC, the petitioner from Melbourne, Florida. He told me the FCC's Mark Lipp "signed" the decision on January 6. According to Hess, his Petition for Rulemaking has thus been approved so his station can upgrade to class C1 status at Melbourne on 107.1, and the Table of Assignments will be changed showing Jupiter to operate as a Class A on 99.5 MHz. Hess said he expects the formal order to be issued soon by the FCC.

When the FCC does issue the order, Jim, your next assignment will be to immediately file a Petition for Rulemaking on behalf of U.S. Three Broadcasting Corp. asking the FCC to upgrade the Jupiter assignment from channel 258A to channel 258C2. Gary Hess, who is an RF engineer, is providing me with the engineering exhibit on this, which I will forward to you as soon as I receive it.

Meanwhile, here in Jupiter I will be working to put both radio stations back on the air. The FM will go back on with the old existing class A facilities (3000 watts ERP @ 300 ft. HAAT) pending the FCC acting on our petition to upgrade to class C2. Will I need any further authorization from the FCC to change frequency from 96.7 to 99.5 and go back on the air? If so, please go ahead and proceed with whatever paperwork is needed.

Yours truly,


Robert B. Taylor, President
U.S. Three Broadcasting Corp.
U.S. Two Broadcasting Corp.
R & R Broadcasting Corp.

RBT/ms

EXHIBIT NO. 4

RECEIVED
JUL 27 1977
FCC MAIL BRANCH

WKSJ KOSY 97FM

THE PALM BEACHES EASY LISTENING STATION

4045-1-1

P.O. Box 848
Jupiter FL
33468

August 22, 1988

James R. Bayes
Wiley, Rein & Fielding
1776 K Street NW
Washington, D.C. 20006

RECEIVED
OCT 27 1988
FCC MAIL BRANCH

Dear Jim:

A) Enclosed are 3 almost-complete copies of the new Form 301 application for WKSJ-Jupiter including my original signature on all 3 copies; the only thing missing is page 5 of Section V-B, the signature page for the engineer. I have mailed 3 copies of page 5 to the engineer, Gary Minker in Florida, for him to sign. I have asked Minker to then return the 3 original-signature pages in an envelope I provided, directly to you in Washington.

Also enclosed is a check to the FCC for another \$500 filing fee, making a total of \$1000 in fees we've paid to the FCC on this very routine application. (I personally feel it is outrageous, unfair and probably illegal for the FCC to require a second \$500 fee from us.) When you receive Minker's signature pages, I trust that you will assemble the 3 copies of the complete Form 301 application and submit them with the second check to the FCC. If anything is missing or not in order, please phone me at (616) 335-5418 or (219) 484-0580 or write me at the Fort Wayne address.

B) Regarding the petition to the FCC proposing allotting channel 288A (105.5 mhz) to Jupiter, Florida as its second FM service, I feel I must do all I can to stop this allotment. (I am not at all interested in having a new FM competitor in my city of license.) (This is MM docket 88-366 by NPRM (DA88-1136) adopted June 29, 1988. Comments are due by September 23, 1988; replies October 11, 1988. You might want to check these dates for accuracy.)

I would like you to prepare and file comments with the FCC before the comment due date (9-23-88) on behalf of U.S. Three Broadcasting Corporation, licensee of WKSJ (FM), Jupiter. Jim, I am open to suggestions from you as to what we should say in these comments, but one thing that comes to my mind would be to ask the FCC to give FIRST service to a community without an FM instead of giving SECOND service to Jupiter which already has an FM as first service (and an AM station).

I have studied the map and discovered White City, a booming suburb just south of Fort Pierce that deserves first service. Our comments to the FCC could be something like this:

"A BETTER USE OF CHANNEL 288A (105.5 mhz) WOULD BE ALLOTING IT TO WHITE CITY, FLORIDA, AS ITS FIRST FM SERVICE. WHITE CITY IS LOCATED IN ST. LUCIE COUNTY ON HIGHWAY U.S. 1 BETWEEN THE CITIES OF FORT PIERCE AND PORT ST. LUCIE. WITH NO LOCAL SERVICE AT PRESENT (AM, FM or TV), WHITE CITY IS A HIGH GROWTH COMMUNITY WHERE THE POPULATION HAS MORE THAN DOUBLED IN THE PAST DECADE (Estimated 1990 population: 3800 to 4200 persons)."

For your information, this channel 288A (105.5 mhz) is the one now being used by WAVW in Vero Beach, Florida, and will be vacated by them when they move to a new class C2 frequency. However, I don't understand why a third party can ask the FCC to allot it to Jupiter when it's already in the Table of Assignments at Vero Beach. When an existing station vacates a frequency due to moving to a new one like this, does that automatically drop that frequency from the Table of Assignments and allow it to be dropped in somewhere else? Why shouldn't the FCC just leave channel 288A allotted to Vero Beach instead of accepting proposals to move it elsewhere?

(Another growing Fort Pierce suburb is also apparently getting a new frequency assigned. The FCC has proposed allotting channel 267A (101.3 mhz) to the city of Port St. Lucie as its first FM service...MM docket 88-217 by NPRM (DA88-737) adopted April 18, 1988, comments due by July 15, 1988, replies August 1, 1988.)

Since it is now being used by WAVW just north of Fort Pierce, I know that technically 105.5 mhz will also go in at White City. What I don't know is whether I need to provide the FCC technical exhibits with our comments which would show the technical feasibility of 105.5 in White City. If you think technical exhibits are necessary, please let me know and I'll get some made.

If you would like to discuss anything regarding preparing our comments, please phone or write. If I don't hear from you, I'll assume you can handle it without anything further from me.

Sincerely,



Robert B. Taylor

RBT/ms

enc.

Mr. Robert B. Taylor

WXKE

2541 Goshen Road

Fort Wayne, Indiana 46808

8/28/88 RECEIVED
OCT 27 1988
FCC MAIL BRANCH

Dear Bob,

This action by the FCC is unfortunate. I have enclosed your original forms (copies) that show the requirement of section VII crossed out in red felt pen. I submitted the form in its entirety according to your instructions. I have already sent the new three signature pages to James Bayes.

3&S will be letting me know about the hang date for the tower in the next few days. Lightening has all the crews scampering.

Best Regards



Instructions for FCC 301
Application For Construction Permit For Commercial Broadcast Station

(FCC Form 301 attached)

GENERAL INSTRUCTIONS

- A. This FCC form is to be used to apply for authority to construct a new commercial AM, FM or TV broadcast station, or to make changes in the existing facilities of such a station. It consists of the following sections:

- I. GENERAL INFORMATION
- II. LEGAL QUALIFICATIONS
- III. FINANCIAL QUALIFICATIONS
- IV. PROGRAM SERVICE STATEMENT
- V. ENGINEERING DATA AND ANTENNA AND SITE INFORMATION
- VI. EQUAL EMPLOYMENT OPPORTUNITY PROGRAM
- VII. CERTIFICATIONS

An applicant for change in facilities need file only Sections I, V and VI. Do not file Sections II, III, IV and VII.

- B. Prepare and submit an original and two copies of this form, all exhibits, and any subsequent amendments to:

The Secretary
Federal Communications Commission
Washington, D.C. 20554

- C. Many references to FCC Rules are made in this application form. Before filling it out, the applicant should have on hand and be familiar with current broadcast rules in 47 Code of Federal Regulations (C.F.R.):

- (1) Part 0 "Commission Organization"
- (2) Part 1 "Practice and Procedure"
- (3) Part 17 "Construction, Marking, and Lighting of Antenna Structures"
- (4) Part 73 "Radio Broadcast Services"

FCC Rules may be purchased from the Government Printing Office, Washington, D.C. 20402. You may telephone the GPO Order desk at (202) 783-3238 for current prices.

- D. Public Notice Requirement:

- (1) Section 73.3580 of the Commission's Rules requires that applicants for construction permits for new broadcast stations and major changes in existing facilities (as defined in Section 73.3571(a)(1) [AM], 73.3572(a)(1) [television], or 73.3573(a)(1) [FM] of the Rules) give local notice in a newspaper of general circulation in the community to which the station is licensed. This publication requirement also applies with respect to major amendments thereto as defined in Sections 73.3571(b) [AM], 73.3572(b) [television], and 73.3573(b) [FM] of the Rules.
- (2) Completion of publication may occur within 30 days before or after tendering of the application. Compliance or intent to comply with the public notice requirement must be certified in Section VII of this application. The information that must be contained in the notice of filing is described in Paragraph (f) of Section 73.3580 of the Rules. Proof of publication need not be filed with this application.

- E. A copy of this completed application and all related documents shall be made available for inspection by the public, pursuant to Section 73.3526 of the FCC Rules.

- F. Replies to questions in this form and the applicant's statements constitute representations on which the FCC will rely in considering the application. Thus, time and care should be devoted to all replies, which should reflect accurately the applicant's responsible consideration of the questions asked. Include all information called for by this application. If any portions of the application are not applicable, so state. Defective or incomplete applications will be returned without consideration. Furthermore, inadvertently accepted applications are also subject to dismissal.

- G. In accordance with Section 1.85 of the Rules, the applicant has a continuing obligation to advise the Commission, through amendments, of any substantial and significant changes in the information furnished.

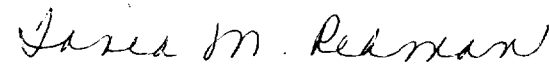
CERTIFICATE OF SERVICE

I, Tania M. Rehman, hereby certify that the attached Second Petition To Enlarge Issues Against Robert B. Taylor submitted on behalf of Jupiter Broadcasting, Corp. was sent this 24th day of July, 1992 to the following persons by U.S. mail, first class postage prepaid:

Honorable Walter C. Miller
Administrative Law Judge
2000 L Street, N.W.
Room 213
Washington, D.C. 20036

J. Richard Carr, Esquire
5528 Trent Street
Chevy Chase, Maryland 20815

Norman Goldstein, Esquire
Hearing Branch
2025 M Street, NW
Room 7212
Washington, DC 20554



Tania M. Rehman